

MARKETPLACE INSPECTION REPORT

Inspection No. 042208184201

Greenleaf, LLC
13960 Palm Road
Neosho, Missouri 64850
EPA Establishment Number: 83893-MO-001

April 22, 2008

PERSONS INTERVIEWED AND INDIVIDUAL RESPONSIBILITIES:

On April 22, 2008 I conducted a For-Cause Marketplace Inspection at Greenleaf, LLC of Neosho, Missouri. I presented credentials and Notice of Inspection to Mr. Ralph Kunz, Operations Manager of Greenleaf, LLC. Mr. Kunz is responsible for all of the daily activities of the firm's Neosho and Pineville, Missouri pesticide production and distribution facilities. Mr. Kunz began his employment with Greenleaf, LLC on February 18, 2008. His Supervisor is Mr. Tom Smith, Owner of Greenleaf, LLC of Lowell, Arkansas. Mr. Kunz replaced Mr. Robert Applegarth, who transferred to the firm's Pineville, Missouri facility.

I also presented credentials to Mr. Shannon Weathers, President and to Mrs. Carlette Anderson, Executive Director of HAZ-M.E.R.T., Inc. of Rogers, Arkansas. Mr. Weather's firm provides RCRA consulting services to Greenleaf, LLC. He and Mrs. Anderson were present throughout the inspection of the Neosho site.

This inspection was conducted on referral from the U. S. Environmental Protection Agency (EPA). The inspection was initiated in part as a follow-up to the January 8 and 9, 2008 For-Cause Producer Establishment Inspection conducted at Greenleaf, LLC in Neosho. During the January inspection Greenleaf, LLC was suspected to have produced and distributed unregistered and misbranded pesticides. Evidence was collected in support of the suspected violations and all of the pesticide inventory held or offered for sale and distribution at that time was placed under Federal Stop Sale, Use Or Removal Order (SSURO). A total of about 42 separate pesticide lots were found to be in violation of FIFRA and were placed under SSURO. The April inspection of Greenleaf, LLC at Neosho was scheduled in part to monitor the pesticides placed under SSURO in January, 2008.

The inspection of Greenleaf, LLC in Neosho was also initiated as a follow-up to the April 21, 2008 For-Cause Producer Establishment Inspection conducted at Greenleaf, LLC in Pineville. Information discovered during the Pineville inspection confirmed that Greenleaf, LLC had been engaged in production and distribution of unregistered and

misbranded pesticides at an unregistered pesticide production establishment. I was accompanied by Mr. Paul Bailey of the Missouri Department of Agriculture and by Mr. Walter Rochelle of EPA during the inspection.

DISCUSSION WITH MANAGEMENT:

Mr. Kunz affirmed that prior to the beginning of his employment with Greenleaf, LLC (Greenleaf) incoming shipments of pesticides and other stressed and damaged merchandise from Wal-Mart Stores, Inc. (Wal-Mart) to Greenleaf, ceased in January, 2008. He indicated no shipments of pesticides have been received by Greenleaf from other sources, as well. According to Mr. Kunz, pesticide inventories currently stored at the firm's Pineville warehouse were transferred there from the Neosho facility in January, 2008.

Mr. Kunz reported that Greenleaf has produced pesticides at both the Pineville and Neosho facilities, since February, 2008. He stated that all of the pesticides produced at Pineville are shipped to the Neosho site for distribution to customers. Mr. Kunz affirmed that all Greenleaf pesticide sales and distribution to consignees occur at the Neosho location. He reported that no receiving, inventory, production or distribution records have been maintained pertinent to pesticide production at Pineville Greenleaf. Mr. Kunz stated that pesticide production and shipping records have been maintained for Neosho Greenleaf, since he became Operations Manager, but that he has not maintained accurate receiving and inventory records.

According to Mr. Kunz, he does not have accurate inventory reports and he does not know the amounts of pesticides currently stored at Greenleaf's Pineville and Neosho sites. Mr. Kunz estimated there are approximately 300 pallets or more of pesticides and mixed products stored at Neosho Greenleaf that have not yet been inspected or sorted. He said the pallets include pallets and totes holding broken and damaged pesticides in their original market containers, as well as undamaged pesticides in original market containers. The contents of the pallets will eventually be checked and sorted and the undamaged pesticide containers removed by Greenleaf employees, according to Mr. Kunz.

Mr. Kunz stated that since January, 2008 Greenleaf has been allowed by Wal-Mart to market undamaged pesticide containers packaged in their original market containers, instead of repackaging the pesticides into Greenleaf containers. He explained that Greenleaf employees search through the pallets of Wal-Mart returned merchandise and remove the full, undamaged and fully labeled pesticide containers. According to Mr. Kunz, the undamaged pesticide containers are cleaned off, sorted, re-stacked on pallets and sold to Overstock Freight of Independence, Missouri. He said the undamaged pesticides are shipped to an Overstock Freight warehouse in Lamar, Missouri.

Mr. Kunz reported that since February, 2008 Neosho Greenleaf has given away some of the damaged, broken and partial pesticide containers found and removed from the

Wal-Mart pallets to ten or fewer individual customers. He said the partial and damaged pesticide containers were given to random local walk-in customers and that no records of this distribution were maintained. Mr. Kunz indicated he did not know the total amounts or the trade names of the pesticides given away, but several different pesticide products were involved.

Mr. Kunz reported the firm has produced nine different Greenleaf registered pesticides from the contents of broken, damaged and partial pesticide containers found in the pallets received from Wal-Mart Return Centers. He said that since February, 2008 these pesticides have been produced at both the Neosho and Pineville Greenleaf sites. Mr. Kunz explained that the contents of partial containers are repackaged into large one ton capacity supersacks, according to the EPA approved Greenleaf 100% Repack registration guidelines. He said the firm's registration guidelines have been printed on a list that identifies the specific Wal-Mart vendor pesticide product that can be used to produce the corresponding Greenleaf registered pesticide. Mr. Kunz stated that Greenleaf produces and labels the firm's 25 EPA registered pesticides in compliance with the EPA registration guideline. Mr. Kunz identified the firm's registered pesticides and the basic registration used as a 100% repack source product, as follows:

Source	Greenleaf Pesticide Trade Name	EPA Reg. No.
538-21	FERTILIZER WITH WEED CONTROL	83893-1
538-282	LAWN FERTILIZER WITH WEED CONTROL	83893-2
432-1212	LAWN INSECT KILLER GRANULES (2% SEVIN)	83893-3
28293-328	LAWN & GARDEN INSECT CONTROL	83893-4
9688-181	LAWN & SOIL INSECT KILLER	83893-5
9688-217	FIRE ANT KILLER & PREVENTER BAIT	83893-6
9688-174	FAST KILL FIRE ANT MOUND DESTROYER	83893-7
53818-18	ST. AUGUSTINE LAWN WEED & FEED	83893-8
432-1209	LAWN & GARDEN 5% DUST	83893-9
432-1210	LAWN & GARDEN 10% DUST	83893-10
279-324	LAWN INSECT CONTROL (Bifenthrin .115%)	83893-11
9494-87	INSECTICIDE GRANULES (Permethrin 0.25%)	83893-12
538-88	LAWN FUNGUS CONTROL	83893-13
432-1339	GRUB KILLER	83893-14
2217-660	WEED & FEED	83893-15
2217-827	WEED & FEED II	83893-16
279-3203	LAWN FERT. W/SUMMER INSECT PROTECTION	83893-17
538-266	GRUB KILLER MAX	83893-18
3125-463	GRUB KILLER II	83893-19
9688-83	LAWN INSECT CONTROL GRANULES	83893-20
28293-323	LAWN INSECT KILLER (.1% Deltamethrin)	83893-21
538-260	FERTILIZER WITH INSECT CONTROL	83893-22
538-202	LAWN FERT. WITH CRABGRASS PREVENTER	83893-23
538-190	LAWN FERT. WITH CRABGRASS PROTECTION	83893-24
538-223	LAWN FERTILIZER WITH MOSS CONTROL	83893-25

Mr. Kunz stated that Greenleaf registered pesticides produced or repackaged into supersacks are not labeled or identified with Greenleaf pesticide labeling. He confirmed that repackaged supersacks of pesticides produced at the firm's Pineville facility have been shipped to Neosho Greenleaf without Greenleaf pesticide labeling. However, he reported that each consignee was given a full copy of the pesticide label at the time of the sale and distribution at Neosho. Mr. Kunz explained that Greenleaf pesticide supersacks produced at both Pineville and Neosho were produced, according to the specific customer orders. He said the firm's supersack pesticide customers are primarily local farmers. He stated that in some cases the contents of the repackaged pesticide supersacks are dumped or loaded onto the farmer's dry fertilizer spreader cart for immediate application to the customer's pastures. Mr. Kunz indicated he prints out a label from a database stored on his computer at the time of sale and delivery to the enduse customer. Mr. Kunz admitted that the net contents of the Greenleaf supersack have not been listed on the container or on the pesticide labeling provided to the consignee, but the total amount of the sale is recorded on a sales invoice.

Mr. Kunz provided access to the firm's pesticide sales records and identified sales of Greenleaf produced pesticides. However, he stated that there was no way to differentiate between sales and distribution of pesticides that were produced at Pineville from those produced at Neosho. Mr. Kunz admitted no record was maintained pertinent to specific pesticide production at the two respective sites. He also reported that the specific trade name of the Greenleaf registered pesticide was not always listed on the sales invoice. Mr. Kunz stated that on each of the pesticide sales invoices the final series or individual product identification number portion of the EPA registration number was listed in parenthesis to identify the specific pesticide sold and distributed. The following is a list of Greenleaf registered pesticides produced and distributed by the firm's Pineville and Neosho sites, according to records provided by Mr. Kunz:

Greenleaf Pesticide Trade Name	EPA Reg. No.
FERTILIZER WITH WEED CONTROL	83893-1
LAWN FERTILIZER WITH WEED CONTROL	83893-2
FAST KILL FIRE ANT MOUND DESTROYER	83893-7
ST. AUGUSTINE LAWN WEED & FEED	83893-8
WEED & FEED	83893-15
WEED & FEED II	83893-16
LAWN FERT. W/SUMMER INSECT PROTECTION	83893-17
GRUB KILLER MAX	83893-18
LAWN FERT. WITH CRABGRASS PROTECTION	83893-24

A copy of each of the above Greenleaf product pesticide labels was collected. Review of the sales records indicated 33 separate or individual sales and distributions of Greenleaf registered and produced pesticides to a number of enduse customers, including many sales to farmers. Several of the sales invoices did not list the name of the consignee and many records did not list the address of the consignee. Many of the sales invoices listed

no sales taxes or bore the words "Tax Exempt", or otherwise indicated the pesticides were intended for agricultural use.

During the inspection at the Pineville Greenleaf facility on April 21, 2008 a customer order document or production schedule was found posted in the pesticide warehouse. The names of several Greenleaf customers were listed with their respective pesticide and fertilizer orders. On April 22, 2008 during records review names similar to three of the Pineville customer's were found recorded on pesticide sales invoices. Several sales invoices listing the following consignees were found on file at Neosho:

Ray Bratton
Floyd Renner
Shane Lake

Other customer names that were listed on the Pineville production schedule were not found within the sales records at Neosho.

Mr. Kunz allowed me to review and collect Greenleaf pesticide labels for the nine pesticides that, according to the firm's sales records were produced and distributed to consignees. Review of the labels revealed the Greenleaf pesticides are not labeled for agricultural use.

During the discussion of Greenleaf's pesticide production activities I advised Mr. Kunz that pesticides could not legally be produced at the firm's Pineville facility until an EPA establishment number was secured from EPA Region - 7. Mr. Kunz agreed to cease all pesticide production at Pineville until an EPA establishment number was assigned to the site. I advised Mr. Kunz that distribution of partial and misbranded pesticide containers was another violative practice that should be ceased and Mr. Kunz agreed to discontinue the practice. I also provided Mr. Kunz with information regarding proper pesticide labeling practices and pesticide producer records maintenance. Mr. Kunz identified the Greenleaf Registered Pesticide Conversion Sheet collected from Pineville Greenleaf, as the list or guide of Greenleaf pesticide registrations for production of other firm's pesticides into Greenleaf pesticides. I completed a Books & Records Maintenance Form and a copy was given to Mr. Kunz. I also provided a copy of the EPA publication *U. S. EPA Small Business Resources*.

Mr. Kunz stated that there currently were no Greenleaf produced and/or registered pesticides held on inventory at the Neosho facility that were packaged, labeled and released for shipment. He said the only salable pesticides were the full undamaged Wal-Mart vendor registered and produced pesticides that were intended for resale to Overstock Freight.

Mr. Kunz indicated that all of the pesticides placed under SSURO during the January, 2008 inspection were still stored in the main warehouse (Building One) at the Neosho facility. However, he said these pesticides had been moved around or rearranged at least four different times inside the warehouse. Mr. Kunz stated that he was certain Greenleaf

had not removed, sold or otherwise distributed any of the pesticides placed under SSURO, since his employment with the firm. Mr. Kunz allowed me to inspect the pesticides under the January SSURO. I observed that pesticide storage conditions inside Building One were vastly improved, since the January, 2008 visit. However, numerous dry pesticide and fertilizer spills were observed within the eastern section of the main warehouse.

The following pesticides were placed under Federal SSURO during the January, 2008 inspection:

Trade Name	EPA Reg. No.	Quantity
ANT, FLEA & TICK KILLER	Unknown	two/2 to 3 pound bags
FERTILIZER WITH WEED CONTROL	83893-1	estimated 50,000 pounds
FIRE ANT & PREVENTER BAIT	89893-6	estimated 20,000 pounds
KILLS DOLARWEED	Unknown	estimated 8 pound bin
YARD GRANULES PREVENTS WEEDS	Unknown	two/estimated 100 lb. bins
GRUB CONTROL II	Unknown	estimated 80 pound bin
GRUB CONTROL I	Unknown	estimated 250 pound bin
FLEA & TICK CARPET POWDER	Unknown	one/2 pound bag
GOPHER BEGONE	Unknown	one/5 pound
BROADLEAF WEED STOPPER	Unknown	three/27 pound pails
ANT, FLEA & TICK KILLER	Unknown	one/30 pound bag
ANT, FLEA & TICK KILLER	Unknown	two/25 pound jugs
ANT, FLEA & TICK KILLER	Unknown	one/21 pound pail
CRABGRASS STOPPER	Unknown	estimated 7 pound bin
TRIPLE PLAY FERTILIZER AND WEED KILLER AND PESTICIDE	Unknown	estimated 250 pound bin
BROADLEAF WEED PREVENTER	Unknown	estimated 100 pound bin
YARD FUNGUS CONTROL	Unknown	estimated 300 to 400 lb. bin

SSURO List Continued:

FUNGUS BEGONE	Unknown	estimated 200 pound bin
FERTILIZER WITH MOSS CONTROL	Unknown	estimated 250 to 300 lb. bin
GRUB CONTROL	Unknown	estimated 2,700 pound bin
GRUB CONTROL	Unknown	estimated 3,000 pound bin
ANT, FLEA & TICK KILLER	Unknown	30/30 pound bags
CRABGRASS PREVENTER	Unknown	estimated 2,700 pound bin
ALL PURPOSE INSECT KILLER	Unknown	two bins/estimated 1,900 lbs.
LOW NITRATE WEED & FEED	Unknown	estimated 750 pound bin
CONTROL OF DISEASES LAWN FUNGICIDE	Unknown	estimated 250 pound bin
FALL WEED & FEED	Unknown	estimated 1,500 pound bin
LAWN FUNGUS CONTROL	Unknown	estimated 750 pound bin
WEED PREVENTER GRANULES	Unknown	estimated 650 pound bin
ANT, FLEA & TICK KILLER	Unknown	estimated 3,000 pound bin
22-2-2 WITH MOSS CONTROL	Unknown	estimated 600 pound bin
BROADLEAF WEED PREVENTER	Unknown	estimated 450 pound bin
5% INSECT DUST	Unknown	estimated 800 pound bin
ANT, FLEA & TICK KILLER	Unknown	estimated 700 pound bin
SNAIL & SLUG KILLER 1	Unknown	estimated 50 pound bin
SNAIL & SLUG KILLER 2	Unknown	two/estimated 50 pound bins
BUG BAIT	Unknown	estimated 5 pound bin
10% DUST	Unknown	estimated 200 pound drum
50% WEED KILLER	Unknown	one gallon jug

SSURO List Continued:

SNAIL & SLUG KILLER	Unknown	four/5 pound bags
5% INSECT DUST	Unknown	eight/5 pound bags & Two/10 pound bags
FIRE ANT KILLER	Unknown	estimated 25 pound box

During the Neosho Greenleaf inspection on April 22, 2008 at least ten of the 42 pesticide lots placed under SSURO were not found. Additionally, many of the pesticide bulk bins under SSURO had lost their small hand lettered signs used to identify them during the January inspection. The absence of any type of pesticide labeling made identification difficult. Photos taken during the January inspection were reviewed on a laptop computer, as an aid to identification of unlabeled SSURO lots.

Several of the pesticides placed under SSURO had been marked with the letters "SS" in black aerosol paint to identify the pesticides under Stop Sale. However, many pallets and totes of pesticides that had not been placed under SSURO were found stored with the pesticides under SSURO and many non-SSURO pesticides were marked with the letters "SS". Some of the pesticide lots that had been placed under SSURO were not marked with the black "SS". The SSURO pesticides had been moved into the eastern section of Building One. The following is a list of the pesticides placed under SSURO in January that were not found during the April 22, 2008 inspection:

Trade Name	EPA Reg. No.	Quantity
ANT, FLEA & TICK KILLER	Unknown	two/2 to 3 pound bags
FLEA & TICK CARPET POWDER	Unknown	one/2 pound bag
GOPHER BEGONE	Unknown	one/5 pound
ANT, FLEA & TICK KILLER	Unknown	one/21 pound pail
TRIPLE PLAY FERTILIZER AND WEED KILLER AND PESTICIDE	Unknown	estimated 250 pound bin
FUNGUS BEGONE	Unknown	estimated 200 pound bin
FERTILIZER WITH MOSS CONTROL	Unknown	estimated 250 to 300 lb. bin
ANT, FLEA & TICK KILLER	Unknown	30/30 pound bags
50% WEED KILLER	Unknown	one gallon jug
FIRE ANT KILLER	Unknown	estimated 25 pound box

Of particular note was the pallet of 30/30 pound bags of ANT, FLEA & TICK KILLER, upon which the actual Federal SSURO notice and list of SSURO pesticides was attached during the January inspection. This particular pallet was one of the missing SSURO lots. A similar pallet of 40/30 pound bags of ANT, FLEA & TICK KILLER was found stored near the SSURO pesticides. Photo numbers P1090096, P1090097 and P1090143 through P1090145 taken of the original 30/30 pound bag pallet during the January, 2008 inspection were compared to the 40/30 pound bag pallet found on April 22, 2008. Clearly they are two different pallets. Additionally, the Federal SSURO notice and list were found taped to a tote of bulk pesticides that had not been placed under SSURO during the January inspection. This tote was stored outside on the pallet racks outside the eastern side of Building One at the time of the January inspection. It had not been placed under SSURO, because Plant Manager Mr. Robert Applegarth indicated the pesticide was not held for sale or distribution. I pointed out the obvious removal and placement of the SSURO notice and list to Mr. Kunz. Mr. Kunz was advised regarding identification of pesticides marked with "SS" that were not a part of the January SSURO.

Also of particular note was the missing one gallon milk jug container of the liquid Glyphosate pesticide 50% WEED KILLER. Additionally, the one/five pound bag of GOPHER BEGONE placed under SSURO was not found. These and other containers were not found among the SSURO pesticide inventory.

Mr. Kunz was advised of the ten missing pesticides under SSURO. He was asked to contact Ms. Akilah Nicks of EPA Region – 7 if any of the missing SSURO pesticide lots were subsequently found. Mr. Kunz was asked for an explanation regarding the whereabouts of the missing pesticides. Mr. Kunz offered no such comments and he refused to speculate on the fate of the missing SSURO pesticides. He maintained his position that all of the pesticides placed under SSURO remained stored in the Building One warehouse.

Mr. Kunz was also questioned regarding the firm's intentions for use of the large inventories of pesticides that had already been debagged and were stored in unlabeled totes. During the January inspection Plant Manager Mr. Robert Applegarth indicated these totes were not held for sale or distribution, but were intended for eventual production into Greenleaf registered pesticides at some point in the future. These debagged "manufacturing use" pesticides were not placed under SSURO. I asked Mr. Kunz if he was confident these pesticides could be used to produce Greenleaf registered pesticides, given the substandard level of quality control demonstrated by Greenleaf prior to his employment as Operations Manager. I asked Mr. Kunz if Greenleaf still intended to use the pesticides for production into Greenleaf registered pesticides. Mr. Kunz had no comment.

During review of the photos taken during the April 22, 2008 inspection I made a tentative identification of one of the missing SSURO lots. Photo number P4220107 likely displays the missing 21 pound yellow pail of ANT, FLEA & TICK KILLER.

At the end of the inspection Mr. Kunz allowed me to inspect Building Two and Building Three, as well as the outside grounds of the Neosho site. Building Three and the outside grounds had been cleaned up to a great extent. Many hundreds of pallets had been removed. Reportedly, all pesticide pallets previously stored outside had been moved into one of the firm's Pineville or Neosho warehouses. Pesticides were still stored inside Building Two, but the isles had been cleared to provide adequate access.

During the inspection inside Building Two several Greenleaf employees were observed cleaning off bags of undamaged pesticides, still in their original market containers and stacking pallets for distribution to Overstock Freight.

Digital photographs were collected during the inspection. A Receipt For Samples was issued to Mr. Kunz.

ATTACHMENTS:

Notice of Inspection signed by Mr. Kunz
Statement signed by Mr. Kunz (2)
FTTS Inspection Form
Receipt For Samples signed by Mr. Kunz
Books & Records Maintenance Form
History of Official Sample
Copies of Greenleaf, LLC Pesticide Bin Labels (9)
Copies of Pesticide Shipping Records (33)
Digital Photographs
Digital Image Chain of Custody
Digital Image Description Sheet
Greenleaf, LLC SSURO List (No. 010808F184201)

Respectfully Submitted,



Gary Steiner
Pesticide Investigator
Missouri Department of Agriculture
April 28, 2008



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

NOTICE OF INSPECTION

ADDRESS (EPA Regional Office)

Kansas City, Kansas

DATE

April 22, 2008

HOUR

8:25

A.M.
P.M.

NAME OF INDIVIDUAL

Ralph B. Kuee

TITLE

Operations Manager

FIRM NAME

Greenleaf, LLC

FIRM ADDRESS (Number, Street, City, State, and ZIP Code)

13960 Palm Road
Neosho, Missouri 64850

SIGNATURE OF EPA EMPLOYEE

Gary Harris

TITLE

Investigator

REASON FOR INSPECTION

FOR THE PURPOSE OF INSPECTING AND OBTAINING SAMPLES OF ANY PESTICIDES OR DEVICES PACKAGED, LABELED, AND RELEASED FOR SHIPMENT, AND SAMPLES OF ANY CONTAINERS OR LABELING FOR SUCH PESTICIDES OR DEVICES, IN PLACES WHERE THE PESTICIDES OR DEVICES ARE HELD FOR DISTRIBUTION OR SALE (Sec. 9(a) and 12(a)(2)(B)); AND FOR THE PURPOSE OF INSPECTING AND OBTAINING COPIES OF THOSE RECORDS SPECIFIED IN SECTION 8 AND 40 CFR PART 169. (Sec. 8 and 12(a)(2)(B)).

VIOLATION SUSPECTED:

For Cause Marketplace Inspection
suspected distribution of unregistered and
misbranded pesticides
and to

Monitor pesticides placed under Stop Sale, Use
or Removal Order in January, 2008

Section 8, 9(a) and 12(a)(2)(B) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended (7 U.S.C. 136 et seq.) are quoted on the reverse of this form.



U.S. ENVIRONMENTAL PROTECTION AGENCY

RECEIPT FOR SAMPLES

ADDRESS (EPA Regional Office)

Kansas City, Kansas

DATE

April 22, 2008

NAME OF INDIVIDUAL

Ralph B. Kunz

TITLE

Operations Manager

FIRM NAME

Greenleaf, LLC

ADDRESS (Street, City, State and Zip Code)

13960 Palm Road
Noosho, Missouri 64850

SAMPLE NUMBERS

042208184201

SAMPLES COLLECTED (Describe fully. List Registration, Lot, Batch, Model, Serial Numbers and other positive identifications).

The following samples were collected by the U.S. Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 9.(a) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended (7 U.S.C. 136 g). This section is quoted on the reverse of this form.

042208184201:

Digital Photographs
Copies of Pesticide Sales & Distribution Records
Photo Copies of the following Greenleaf LLC pesticide labels:
Fertilizer with weed control, EPA Reg. No. 83893-1
Lawn Fertilizer with weed control, 83893-2
St. Augustine Lawn Weed Feed, 83893-8
Five Aft Mowall Control, 83893-7
Weed & Feed, 83893-15
Weed & Feed II, 83893-16
Lawn Fertilizer with Summer Insect Protection, 83893-17
Grub Killer Max, 83893-18
Lawn Fertilizer with Crabgrass Protection, 83893-24

ACKNOWLEDGMENT OF PRODUCER/REGISTRANT

The undersigned acknowledges that the samples shown above were obtained from pesticides or devices that were packaged, labeled, and released for shipment.

SIGNATURE (Owner, Operator, or Agent)

Ralph B. Kunz

TITLE (Owner, Operator or Agent)

Operations Manager

☐ DUPLICATE SAMPLES
REQUESTED AND PROVIDED☒ DUPLICATE SAMPLES
NOT REQUESTED

SAMPLES WERE

☐ PURCHASED☒ BORROWED

AMOUNT PAID FOR SAMPLES

\$

N/A

☐ CASH☐ VOUCHER☒ TO BE BILLED

NAME OF COLLECTOR (Print or type)

Gary J. Steider

TITLE OF COLLECTOR

Investigator

SIGNATURE OF COLLECTOR

Gary J. Steider

STATEMENT

I, Ralph Kunz, under affirmation say:

I am Operations Manager of Greenleaf, LLC at Neosho, Mo. I am responsible for all of the daily activities at both our Neosho and Pineville, Mo. facilities. Greenleaf has received no further shipments of pesticides or other goods from Wal-Mart or any other source since January 2008. I was hired to own Greenleaf on February 18, 2008. My Supervisor is Mr. Tom Smith, Owner of Greenleaf LLC. Pesticides stored at both our Pineville and our Neosho sites were received before February, 2008, respectively. We have produced pesticides at Pineville and at Neosho since February, 2008. All sales to customers derive from Neosho. No production, inventory, receiving or shipping records are maintained for pesticides produced at the Pineville Greenleaf site. I have maintained production and shipping records for Neosho Greenleaf. I have not maintained accurate receiving and inventory records for Neosho. I do not know or have an accurate inventory report for pesticides stored at Pineville and Neosho. Since February, 2008 we have sold pesticides still packaged in their original market containers. We sold these pesticides to Overstock Freight of Independence, Mo. They were shipped to their Lamar, Mo. Warehouse. Neosho Greenleaf did give away a number of partial bags of several different pesticides to ten or less individual customers. I did not keep any record of this distribution and I will cease distribution of any partial or disbonded containers of pesticides.

I estimate there are 300 pallets or more of mixed products, many of which might contain full or partial containers of pesticides. We intend to sort through these pallets as time allows. Full, fully labeled pesticides will be sold to Overstock Freight. Partial pesticide containers, ~~at~~ ^{from} Pineville and at Neosho will be repackaged into one ton capacity super sacks for re-sale to local farmers. We will cease production at Pineville until it receives its own EPA establishment number.

Since February, 2008 both the Pineville and Neosho Greenleaf sites have repackaged pesticides into supersacks for distribution and sale. Pesticides produced at Pineville were shipped to Neosho Greenleaf without pesticide labeling. Upon receipt I printed out labeling from my computer and provided the label to the end use customers. The net contents are not listed on the label or on the super sack. In some sales the repackaged super sack of pesticides were loaded or emptied into the customer's dry fertilizer spreader cart. Pesticides produced by Greenleaf were produced and labeled in compliance with our EPA approved pesticide registration guidelines.

I hereby affirm that the above is true to the best of my knowledge.

Signature: Ralph Kunz

Title: Operations Manager

Date: 4/22/08

Firm Name: Green Leaf LLC

Address: 13960 Palm Road

City: Neosho

State: Missouri

Zip Code: 64850

Signature of Witness: Ray J. Smith

STATEMENT

I, Ralph Kunz, under affirmation say:

I have provided Gary Steiner with copies of pesticide sales and distribution records pertaining to pesticides produced at Greenleaf's Pineville and Neosho facilities. The particular trade name is not always listed on the record. In all cases the individual product was identified by the EPA Reg. No. or product identification number. I can not identify by the sales tickets which sales were derived from Pineville production and which sales were derived from Neosho production.

I have provided Gary Steiner with copies of labeling for the pesticides produced by Greenleaf, LLC since February, 2008. We have produced the following registrations: EPA Reg. No.: 83893-1, 83893-2, 83893-3, 83893-7, 83893-15, 83893-16, 83893-17, 83893-18, and 83893-24. In the future we will ensure the net contents and appropriate EPA establishment number is listed on all pesticide containers produced by Greenleaf, LLC

The pesticides placed under Stop Sale use or Removal order (SSURO) have been moved around inside our Neosho main warehouse (Bldg. No. 1) at least four different times. I am certain we have not removed, sold or otherwise distributed any of the pesticides placed under SSURO since I was hired at Greenleaf.

I hereby affirm that the above is true to the best of my knowledge.

Signature: Ralph Kunz

Title: Operations Manager

Date: April 22, 2008

Firm Name: Greenleaf, LLC

Address: 13960 Palma Road

City: Neosho

State: Missouri

Zip Code: 64850

Signature of Witness: Gary J. Steiner

Printed on Recycled Paper

Env Form 1106

042208184201

4/22/08

547587

(3 pages)
655

EPA Reg. No.

83893-1

" - 2

" - 15

Greenleaf, LLC Sales Invoices

"Only records of
pesticide production
and distribution,"
according to:
Mr. Kunz

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE			
NAME		Nelson Watson		4/14/08			
ADDRESS							
CITY, STATE, ZIP		TAX Exempt					
SOLD BY		CASH	C.O.D.	CHARGE	ON ACCT.	MDSE. RETD.	PAID OUT
QUANTITY	DESCRIPTION	PRICE	AMOUNT				
1							
2	5 ton High Nitrate sand						
3							
4	Toss		10000				
5	GL Fertilizer 44% (1)						
6	2 GL Liquid Fertilizer 34% (2)						
7	2 GL Liquid Fertilizer 15% (15)						
8							
9							
10							
11							
12							
13							
14							
15	Guaranteed Analysis Grade						
16	Statement 29-3-4						
17	Total Nitrogen (N).....					29	
18	Available Phosphate (P2O5).....					3	
19	Soluble Potash (K2O).....					4	
20							
RECEIVED BY							

No address listed
for Consignee

adams

KEEP THIS SLIP FOR REFERENCE

5805

042208/84201

(4) 4/22/08

605

547578

EPA Reg. No.
83893-2
" - 15
" - 3

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		ADDRESS		CITY, STATE, ZIP	
DAVID EADS				4-15-08	
SOLD BY		CASH	C.O.D.	CHARGE	ON ACCT.
QUANTITY		DESCRIPTION		PRICE	AMOUNT
1		TAX Exempt			
2		13465# HIGH NITRATE		1851	-
3		W4F		750	
4		less PP		1101	
5		27-3-4			
6		27 GL LF (20 load CH. (2)			
7		3T GL W4F (2)			
8		1.7T GL St Arc W4F (8)			
9		OK # 1313			
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
RECEIVED BY		Soluble Potash (K2O)		4	
Guaranteed Analysis		Total Nitrogen (N)		27	
Available Phosphate (P2O5)		3			
Soluble Potash (K2O)		4			

5805

KEEP THIS SLIP FOR REFERENCE

No address listed for Consignee

042208184201
 Records of Sales
 3/1/85
 GSS
 (page 1)

EPA Reg. No.
 83893-18

4/22/08

DL 500-028739 747592

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME Thomas Davis				4-12-8	
ADDRESS					
CITY, STATE, ZIP					
SOLD BY SH					
CASH		C.O.D.		CHARGE	
ON ACCT.		M.D.S. RETD.		PAID OUT	
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
1					
2	3 Ton High Nitrate	28.825	288.25		
3					
4	GL S. AUC. W/F (18)	61	886.66		
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16	Guaranteed Analysis Grade				
17	Statement 29-3-41				
18	Total Nitrogen (N).....	29			
19	Available Phosphate (P2O5).....	3			
20	Soluble Potash (K2O).....	4			
RECEIVED BY					

Paid
 Check 2862

No full address
 listed for
 consignee

042208104201

(page 2)
655

747563

DL 478-82-5348

29-17-8

No address listed
for consignee

EPA Reg. No.

83893-17

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		ADDRESS		CITY, STATE, ZIP	
Chester Season				Goodman	
SOLD BY		CASH	C.O.D.	CHARGE	ON ACCT.
S.H.					
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
1					
2	4 bags Starter Fertilizer	7.00	28.00		
3					
4	2 bags Summer Brand Fertilizer	12.00	24.00		
5					
6	GL Lawn Fertilizer @ Summer Brand	10.00	3.00		
7					
8					
9					
10					
11					
Guaranteed Analysis Grade Statement		20-27-5	25.86		
Total Nitrogen (N).....		20			
Available Phosphate (P2O5).....		27			
Soluble Potash (K2O).....		5			
Guaranteed Analysis Grade Statement		28-3-8			
Total Nitrogen (N).....		28			
Available Phosphate (P2O5).....		3			
Soluble Potash (K2O).....		8			

5805

KEEP THIS SLIP FOR REFERENCE

042208184201
(20) 655

442108

DL 512742121

335498

CUSTOMER'S ORDER NO.

DATE 3-15-8

NAME

Grant Merriman

ADDRESS

2250 State Hwy E

CITY, STATE, ZIP

Rocky Comfort, Mo. 64861

SOLD BY CASH

C.O.D.

CHARGE

ON ACCT.

MDSE. RETD.

PAID OUT

QUAN.

DESCRIPTION

PRICE

AMOUNT

1

2

3

4

5

6

7

8

9

10

11

12

EPA REG. NO.

83893-3 } #
" - 15 } 335498

83893-15-335499

1	3	7011 28-3-3	500	00
2	1	Box Charcoal	40	
3	2	27 GL LF @ 100 lb @ 2	540	
4	1	17 100 lb Fuel (15)		
5	1	paid		
6	1	check 6874		
7				
8				
9				
10				
11				
12				
Guaranteed Analysis 28-3-3				
Total Nitrogen (N) 28				
Available Phosphate (P ₂ O ₅) 3				
Soluble Potash (K ₂ O) 3				
RECEIVED BY Tax Exempt				

adams 4705 KEEP THIS SLIP FOR REFERENCE

335499

CUSTOMER'S ORDER NO.

DATE 3-15-8

NAME

Grant M

ADDRESS

2250 State Hwy E

CITY, STATE, ZIP

Rocky Comfort, Mo. 64861

SOLD BY CASH

C.O.D.

CHARGE

ON ACCT.

MDSE. RETD.

PAID OUT

QUAN.

DESCRIPTION

PRICE

AMOUNT

1

2

3

4

5

6

7

8

2 1/2 28-3-3 200

GL 100 lb Fuel (15)

Tax Exempt

paid

check

1	2 1/2	28-3-3	200	
2	1	GL 100 lb Fuel (15)		
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
Guaranteed Analysis 28-3-3				
Total Nitrogen (N) 28				
Available Phosphate (P ₂ O ₅) 3				
Soluble Potash (K ₂ O) 3				
RECEIVED BY Tax Exempt				

adams 4705
Total Nitrogen (N) 28
Available Phosphate (P₂O₅) 3
Soluble Potash (K₂O) 3

042208184201
(67)
655

4/22/08

547555

EPA Reg. No.

83893-15

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE			
NAME				4-14-8			
ADDRESS							
CITY, STATE, ZIP							
SOLD BY		CASH	C.O.D.	CHARGE	ON ACCT.	MDSE RETD	PAID OUT
S/H		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QUANTITY	DESCRIPTION	PRICE	AMOUNT				
1							
2	1060 lbs Wt Feed		125.00				
3			9.30				
4							
5	GL Wt Feed (15)		134.30				
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17	Guaranteed Analysis Grade						
18	Statement						
19	Total Nitrogen (N).....		28				
20	Available Phosphate (P2O5).....		3				
RECEIVED	Soluble Potash (K2O).....		3				

adams
5805

KEEP THIS SLIP FOR REFERENCE

No Name & address
listed for
signature

0422008184201
(17)
654

4/22/08

962495

Customer
Not Identified

EPA Reg. No.
83893-15

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		ADDRESS		CITY, STATE, ZIP	
SOLD BY		CASH		C.O.D.	
QUANTITY		DESCRIPTION		CHARGE	
1		20 lbs High Nitride		ON ACCT	
2		1 Super Sack		MIDSE RETD	
3		GL 10# Band		PAID OUT	
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
RECEIVED		Total Nitrogen (N)		27	
Available Phosphate (P ₂ O ₅)		3			
Soluble Potash (K ₂ O)		4			

5805

RECEIVED

adams

042208184201

(16)
655

4/22/08

972010

EPA Reg. No.
83893-2

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		ADDRESS		CITY, STATE, ZIP	
QUANTITY		DESCRIPTION		PRICE	AMOUNT
1					
2					
3	1	Tom High Nitrate		258.00	
4				22.00	
5	1	Super Sack		330.96	
6					
7		GL LFO used chl. (2)			
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
Guaranteed Analysis Grade					
Statement 21-3-Y					
Total Nitrogen (N).....					
Available Phosphate (P2O5).....					
Soluble Potash (K2O).....					
REC.					

KEEP THIS SLIP FOR REFERENCE

042208184201
(12)
655

4/22/08

972031

EPA Reg. No.

83893-15

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		CHARLES HORTON		4/5/08	
ADDRESS		6816 FINE LOG			
CITY, STATE, ZIP		ROCKY COMFORT, MO			
SOLD BY		CASH	C.O.D.	CHARGE	ON ACCT.
SH					
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
1 3 1/2 TON	FERTILIZER		750		
2		TAX	56.06		
3	GL W & F	TOTAL	806.06		
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
RECEIVED BY					

adams
5805

KEEP THIS SLIP FOR REFERENCE

042208184201

(113)
635

4/32/08

972038

EPA Reg. No.

83893-8

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		ADDRESS		CITY STATE ZIP	
Grant Morrison		2250 State Hwy E		Rocky Comfort, Mo 64861	
SOLD BY		CASH	C.O.D.	CHARGE	ON ACCT.
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
1					
2	3600 Lb Weed + Feed	1.25	450.00		
3	GL ST Aug D & F (8)		33.63		
4					
5					
6					
7					
8	70 Lb 1990				
9					
10					
11					
12	3 Super Sack	-8.00	24.00		
13					
14	DEPOSITS				
15					
16	Customer overpaid \$30.00				
17					
18	Will credit on next delivery				
19					
Guaranteed Analysis Grade					
20	Statement 29-3-4				
RE	Total Nitrogen (N).....2.9				
21	Available Phosphate (P2O5).....3				
22	Soluble Potash (K2O).....4				
REFERENCE					

04228/84281
(14)
625

4/22/08

962461

EPA Reg. No.
83893-15
" - 16

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		Nelson Watson		4-20-8	
ADDRESS		215 Highland Ter			
CITY, STATE, ZIP					
ORDER NO		Tax Exempt			
SOLD BY		S.H.			
CASH		C.O.D.		CHARGE	
ON ACCT.		MDSE RETD.		PAID OUT	
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
1					
2	3 Ton UHF Fent				
3					
4	29-3-4	250	7500		
5					
6	2T GL 10 # 7 rad (15)				
7	1T GL 10 # 7 rad II (16)				
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
RECEIVED BY					

paid
check 1450

042208184201
(15)
6<3
4/22/08

512459

Customer not
identified

EPA Reg. No.
83893-2

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE		
				5-22-8		
NAME						
ADDRESS						
CITY, STATE, ZIP						
SOLD BY						
CASH						
C.O.D.						
CHARGE						
ON ACCT.						
MISE RETD						
PAID OUT						
QUANTITY	DESCRIPTION	PRICE	AMOUNT			
1						
2	1 box Heat-Tick		32.00			
3						
4						
5	1 Ton		930.00			
6	GL LE Wood Oil (2)		117.20			
7						
8						
9						
10						
11						
12						
13	Guaranteed Analysis Grade					
14	Statement 28-3-3					
15	Total Nitrogen (N).....					32.00
16	Available Phosphate (P2O5).....					43.00
17	Soluble Potash (K2O).....					13.00
18						
19						
20						
RECEIVED BY						

5805

KEEP THIS SLIP FOR REFERENCE

042208184201

(117)
633

4/22/08

5121454

EPA Reg. No.
83893-16
" - 1

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		ADDRESS		CITY, STATE, ZIP	
QUANTITY		DESCRIPTION		PRICE	AMOUNT
1					
2	3	Ten 16 LF Tent		260	780
3	3	Super Sacks		200	600
4	21	GLD F II (16)		25	525
5	17	GL F @ Wind Off (1)		4.82	81.94
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					

Guaranteed Analysis Grade

Statement 22

Total Nitrogen (N) 22

Available Phosphate (P2O5) 3

Soluble Potash (K2O) 11

CR REFERENCE

PAID
950.00
46.22
403.78

042208 184201
(118)
653

4/22/08

512453

EPA Reg. No.
83893-15

CUSTOMER'S ORDER NO.		DEPARTMENT		PAID	
NAME		ADDRESS		CITY, STATE, ZIP	
AL Gas		Alec 8th		Box 6000 - Farmer	
CITY, STATE, ZIP		CASH		C.O.D.	
SOL. BT		CHARGE		ON ACCT.	
MIDSE RETD		PAID OUT			
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
1					
2					
3	2 Ton W&F Fertil	950	500		
4					
5	1 mix box F		100		
6					
7	GL W&F (15)		600		
8					
9					
10					
11					
12					
13					
14					
15					
16	Guaranteed Analysis Grade				
17	Statement 28-3-3				
18	Total Nitrogen (N)...28-3				
19	Available Phosphate (P2O5)~3				
20	Soluble Potash (K2O).....3				
RECEIVED BY					

No Address
for Assignee

KEEP THIS SLIP FOR REFERENCE

5
4
3
2
1

CUSTOMER'S ORDER NO.	DEPARTMENT	DATE 3/28/08	
NAME Jennie Belmon			
ADDRESS 1602 Rowan Dr,			
CITY, STATE, ZIP Koshho MO 64850			
SOLD BY CASH	G.O.D.	CHARGE ON ACCT.	
MISC RETD	Paid Out		
QUANTITY	DESCRIPTION	PRICE	AMOUNT
1	240 LB uret Fee		300.00
2			
3	Tax EXCMT		
4	72 CR # 4400		
5			
6			
7	[scribbled]		
8	GL LF @ Uniquus Production		
9	(2)		
10	30-3-4		
11			
12			
13			
14			
15	Guaranteed Analysis Grade Statement _____		
16	Total Nitrogen (N)..... <u>30</u>		
17	Available Phosphate (P2O5). <u>30</u>		
18	Soluble Potash (K2O)..... <u>4</u>		
19			
20			

RECEIVED BY

KEEP THIS SLIP FOR REFERENCE

042208184201

(21)
655 4/22/08

512576

EPA REG. NO.
83893-15

DL 11678079003

DATE 3-27-8

CUSTOMER'S ORDER NO.		DEPARTMENT				DATE	
NAME		ADDRESS				CITY, STATE, ZIP	
QUANTITY		DESCRIPTION				PRICE	AMOUNT
1						2.1	75.00
2	500 lbs	WATER					
3		GT P&F (15)				764	3.00
4	4 lbs	Perlite					
5							
6	20 lbs	Sand				154	2.85
7							
8	11 lbs	Epson Salt				564	5.00
9							
10	4 lbs	Organic Plant Food				254	1.00
11							
12	20 lbs	Soil Conditioner					
13							
14		Paid Check 1392				tax	6.74
15						total	97.59
16							
17		Guaranteed Analysis 28-3-3					
18		Total Nitrogen (N) 28					
19		Available Phosphate (P ₂ O ₅) 3					
20		Soluble Potash (K ₂ O) 3					

KEEP THIS SLIP FOR REFERENCE

042208184201
(22)
635 4/22/08

512575

EPA Reg. No.

83893-3

" - 2

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		Sim Coleville		3-27-8	
ADDRESS		Andersen			
CITY, STATE, ZIP		Lex 63404			
SOLD BY		G.H.			
CASH		C.O.D.		CHARGE	
ON ACCT.		MIDSE RETD		PAID OUT	
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
1					
2					
3	3 1/2 ton WtF Fent	77760			
4					
5	27 CL St Aug. WtF (8)				
6					
7	1 1/2 T CL LF @ WtF Contol (2)				
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					

RECEIVED BY

Guaranteed Analysis Grade Statement

Total Nitrogen (N)..... 29

Available Phosphate (P2O5)..... 5

Soluble Potash (K2O)..... 4

check 3658

paid

042208184201

(24)

655

4/22/08

747595

EPA Reg. No.

83893-15

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
184208184201				4-19-08	
NAME Charles Steele					
ADDRESS 11390 S OHIO RD					
CITY, STATE, ZIP					
SOLD BY Merrill and TAX EXEMPT					
CASH C.O.D. CHARGE ON ACCT. MDSE RETD PAID OUT					
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
1					
2	3 Ton of High Nitrate		110000		
3					
4	GL WDF (15)				
5					
6					
7					
8					
9					
10					
11					
12					
13					
14	Guaranteed Analysis Grade				
15	Statement				
16	Total Nitrogen (N).....				
17	Available Phosphate (P2O5).....				
18	Soluble Potash (K2O).....				
19					
20					
RECEIVED BY					

042208184201

(125)

653

4/22/08

958783

EPA Reg. No.

83893-8

" - 1

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		Robert Rose		3/24/08	
ADDRESS		10366 Poppy Dr.			
CITY, STATE, ZIP		Mesa Mo. 64550			
SOLD BY		CASH	C.O.D.	CHARGE	ON ACCT.
B6					
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
1					
2	250 High Nitrate	250	50.00		
3			41.94		
4			604.19		
5					
6					
7					
8					
9					
10					
11	Guaranteed Analysis	29-3-4	17		
12	Total Nitrogen (N)	29	GL ST AUGUSTINE		
13	Available Phosphate (P ₂ O ₅)	3	LAWN WEED & FEED (8)		
14	Soluble Potash (K ₂ O)	4	17		
15	Guaranteed Analysis	29-3-4	GL FERTILIZER		
16	Total Nitrogen (N)	29	WITH WEED CONTROL (1)		
17	Available Phosphate (P ₂ O ₅)	3			
18	Soluble Potash (K ₂ O)	4			
19	RECEIVED BY				
20					

5805

KEEP THIS SLIP FOR REFERENCE

042208104201

(120)

655

4/22/08

958778

EPA Reg. No.

83853-15

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		ADDRESS		CITY, STATE, ZIP	
Vic Boyer Inc		5652 E		Hayden	
		Fairland		OK 74343	
SOLD BY		CASH	C.O.D.	CHARGE	ON ACCOUNT
S.H.					8/866325
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
1					
2					
3	6 Tons 28-3-3	250	1,250.00		
4					
5					
6	Top 1 D#				
7					
8	Cell 321				
9					
10	Gr Wood & Feed				
11					
12					
13					
14					
15					
16					
Guaranteed Analysis		28-3-3			
Total Nitrogen (N)		28			
Available Phosphate (P ₂ O ₅)		3			
Soluble Potash (K ₂ O)		3			

042208184201
(27)
655
4/22/08

958711

DL So 79153003

5-17-8

EPA Reg. No.
83893-2

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE		
NAME		Norman Bauer		5-17-8		
ADDRESS		1797 Bachman RD.				
CITY, STATE, ZIP		Anderson, MO				
SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT.	MOSE RETD.	PAID OUT
J.H.						
QUANTITY	DESCRIPTION	PRICE	AMOUNT			
1						
2	1 Ton 28-3-8	250	250.00			
3	G.F. @ Road Condition (2)	100	38.00			
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17	Guaranteed Analysis	28-3-8	250.00			
18	Total Nitrogen (N)	28				
19	Available Phosphate (P ₂ O ₅)	3				
20	Soluble Potash (K ₂ O)	3				
RECEIVED BY						

Paid
check 7412

adams

5805

KEEP THIS SLIP FOR REFERENCE

04/22/08 184201 4/22/08
 (25) 655

335497

CUSTOMER'S ORDER NO.		PAGE 15-8	
NAME Gary Brewer			
ADDRESS			
CITY, STATE, ZIP			
SOLD BY CASH C.O.D. CHARGE ON ACCT. MDSE. RETD. PAID OUT			
QUAN. DESCRIPTION PRICE AMOUNT			
1			
2	840123-3	150	150
3	15 GL 10#E (15)		450
4	15 GL 10#E (15)		450
5	21 GL 10#E (21)		630
6			
7			
8			
9			
10			
11			
12			
Guaranteed Analysis			
Total Nitrogen (N) 3			
Available Phosphate (P ₂ O ₅) 3			
Soluble Potash (K ₂ O)			

No address listed
 for consignee
 "Farmer"
 EPA Reg. No.
 63893-15
 " - 2

092208184201 4/22/08
C317 655

DL 681368287 335482

#335482
EPA Reg. No.
83893-15

#335493
EPA Reg. No.
83893-1
Consignee's
address not
listed

These Invoices
might record
pesticides produced
at Pineville.

CUSTOMER'S ORDER NO.		DATE	
NAME Russell Bides		3-13-8	
ADDRESS PO Box 9			
CITY, STATE, ZIP Union OK SW 626843			
SOLD BY	CASH	C.O.D.	CHARGE
SH			
		ON ACCT.	MDSE. RETD.
			PAID OUT
QUAN.	DESCRIPTION	PRICE	AMOUNT
1			
2	GL LF weed	250	500.00
3	GL LF (15) (ced)	237	30.00
4	678 lbs K-31	354	731.30
5			
6			
7			
8			
Paid check		1093	
Guaranteed Analysis Grade			
Statement 28-3-3			
Total Nitrogen (N) 28			
Available Phosphate (P2O5) 23			
Soluble Potash (K2O) 3			

4705 KEEP THIS SLIP FOR REFERENCE

335493

CUSTOMER'S ORDER NO.		DATE	
NAME Ray Breffon		3-14-8	
ADDRESS			
CITY, STATE, ZIP			
SOLD BY	CASH	C.O.D.	CHARGE
SH			
		ON ACCT.	MDSE. RETD.
			PAID OUT
QUAN.	DESCRIPTION	PRICE	AMOUNT
1			
2	GL LF weed	1	
3	control		
4	28-3-13		
5	14 893 lb on second		
6			
7			
8			
pick up, we owe		772, 895	165 left
Guaranteed Analysis Grade			
Statement 28-3-3			
Total Nitrogen (N) 28			
Available Phosphate (P2O5) 23			
Soluble Potash (K2O) 3			
RECEIVED BY			

4705 KEEP THIS SLIP FOR REFERENCE

042208184201
(23) 4/22/08
605

512553

EPA Reg. No
83893-3
" - 24
Customer's
address not
listed

CUSTOMER'S ORDER NO.		DEPARTMENT		BATCH	
NAME		CASH		C.O.D.	
ADDRESS		CHARGE		ON ACCT.	
CITY, STATE, ZIP		MIDSE RETD		PAID OUT	
1	QUANTITY	DESCRIPTION		PRICE	AMOUNT
2		owed 400 ton		3/25/08	Also picked up
3		picked up 13 ton		13 1/2 ton	
4		owed 387 ton		361.25	owed
5		today picked up			
6		owed 12 608			
7		Guaranteed Analysis			
8		Total Nitrogen (N)			
9		Available Phosphate (P ₂ O ₅)			
10		Soluble Potash (K ₂ O)			
11		Guaranteed Analysis Grade			
12		Statement			
13		Total Nitrogen (N)			
14		Available Phosphate (P ₂ O ₅)			
15		Soluble Potash (K ₂ O)			
16		Guaranteed Analysis			
17		Total Nitrogen (N)			
18		Available Phosphate (P ₂ O ₅)			
19		Soluble Potash (K ₂ O)			
20		Guaranteed Analysis			

RECEIVED BY: 4-T GLW & F (15)

042208184201

(5)

657

4/22/08

547559

D 5078114028

DATE 4-14-8

EPA Reg. No.
83893-24
Consignee's
address is not
listed.

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		ADDRESS		CITY, STATE, ZIP	
QUANTITY		DESCRIPTION		PRICE	AMOUNT
1	3	100 lb	100 lb	250.00	750.00
2	100 lb	100 lb	100 lb	55.92	5592.00
3	100 lb	100 lb	100 lb	805.92	80592.00
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					

PAID

CHECK 2196

GLF with Glycerol (24)

Statement 30-3-4

Total Nitrogen (N) 36

Available Phosphate (P2O5) 38

Soluble Potash (K2O) 4

047208184201
(120) 4/22/08
655

512580

EPA Reg. No.
83893-8
Consignees
address is not
listed

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
				3-27-8	
NAME SHADE Lake					
ADDRESS					
CITY, STATE, ZIP					
SOLD BY SH		CASH	C.O.D.	CHARGE	ON ACCT.
QUANTITY		DESCRIPTION		PRICE	AMOUNT
1					
2	3		100 1/4 Feed	750	750.00
3			GL ST AUG 1045 (5)		
4	3		Super Backs	800	2400
5					
6					
7			Tax	57	85
8					
9			Total		831.85
10					
11					
12					
13					
14					
15					
16					
17			Guaranteed Analysis	29-3-4	
18			Total Nitrogen (N)	29-3-4	
19			Available Phosphate (P ₂ O ₅)	29-3-4	
20			Soluble Potash (K ₂ O)	29-3-4	
RECEIVED BY					

042208184201
(116)
655
4/22/08

512458

EPA Reg. No.
83893-24
"-15
Address is
not listed

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		ADDRESS		CITY, STATE, ZIP	
Shane Lake		We Sh No		MD	
ADDRESS		CASH		G.O.D.	
SOLD BY		CHARGE		ON ACCT.	
QUANTITY		DESCRIPTION		PRICE	
1				AMOUNT	
2		3 TON High Nitrate		2400	
3		100 lb. Fertilizer		55.98	
4		21 GL LF Fertilizer		805.98	
5		11 GL LF Fertilizer		151.98	
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					

RECEIVED BY

Guaranteed Analysis Grade
Statement 29-3-4 - 28-2-3
Total Nitrogen (N).....
Available Phosphate (P2O5).....
Soluble Potash (K2O).....

PAID
Check 1614

042208184201

(9)
635 4/22/08

512474

EPA Reg. No.
83893-17

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE	
NAME		Seward Lake		4-1-8	
ADDRESS		11725 Gatecuttery			
CITY, STATE, ZIP		Woodsboro MD		451-9359	
SOLD BY		CASH	C.O.D.	CHARGE	ON ACCT.
SHE					
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
1					
2	2 Ton High Nitrate	300	600.00		
3	29-B-4				
4					
5	1 Ton UDF Fert	250	250.00		
6	28-8-8				
7	CL L & C Fertilizer	8.50	8.50		
8	Ammoniacal Phosphate (17)	63	63.00		
9					
10					
11					
12	Guaranteed Analysis Grade				
13	Statement 28-3-8				
14	Total Nitrogen (N)				
15	Available Phosphate (P2O5)				
16	Soluble Potash (K2O)				
17	Guaranteed Analysis				
18	Statement 28-3-4-28-2-2				
19	Total Nitrogen (N)				
20	Available Phosphate (P2O5)				
21	Soluble Potash (K2O)				
REC.					

5805

KEEP THIS SLIP FOR REFERENCE

041208184201

(11) 4/22/08
655

EPA Reg. No.
P3893-15
Address is not
listed

DL 489 94 3656 972012

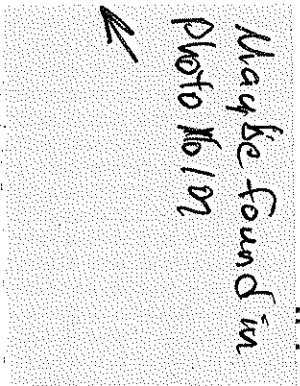
CUSTOMER'S ORDER NO.		DEPARTMENT		DATE			
NAME		Shane Leikes		4-5-8			
ADDRESS		451-9359					
CITY, STATE, ZIP							
SOLD BY		CASH	C.O.D.	CHARGE	ON ACCT.	MIDSE RETD	PAID OUT
STH.							
QUANTITY	DESCRIPTION	PRICE	AMOUNT				
1							
2							
3	3 Ton High Nitrate	300	900				
4							
5	1 Ton High Nitrate	230	230				
6	we High Nitrate (15)	1150	1150				
7							
8	4 Super Jacks	32	32				
9							
10							
11							
Guaranteed Analysis Grade							
Statement 30-0-4		total		1270			
Total Nitrogen (N).....		36					
Available Phosphate (P2O5).....		4					
Soluble Potash (K2O).....		4					
Guaranteed Analysis Grade							
Statement 21-3-4		paid		1015			
Total Nitrogen (N).....		21					
Available Phosphate (P2O5).....		3					
Soluble Potash (K2O).....		4					
RECEIVED BY							

4-22-08
check mark (✓) = indicates Pesticide placed under SSURO
was found & identified. NO check mark (✓)
product (S) were not found.

Greenleaf LLC 13960 Palm Road, Neosho, MO - SSURO LIST (#010808F184201)

<u>Trade Name</u>	<u>EPA Reg. #</u>	<u>Quantity</u>
ANT, FLEA & TICK KILLER <i>didn't find</i>	Unknown	two/2 to 3 pound bags
✓ FERTILIZER WITH WEED CONTROL 888 <i>present</i>	83 893-1	estimated 50,000 pounds
✓ FIRE ANT & PREVENTER BAIT <i>present</i>	89893-6	estimated 20,000 pounds
✓ KILLS DOLARWEED <i>present</i>	Unknown	estimated 8 pound bin
✓ YARD GRANULES PREVENTS WEEDS <i>present</i>	Unknown	two/estimated 100 lb. bins
✓ GRUB CONTROL II <i>present?</i>	Unknown	estimated 80 pound bin
✓ GRUB CONTROL I <i>present</i>	Unknown	estimated 250 pound bin
FLEA & TICK CARPET POWDER <i>didn't find</i>	Unknown	one/2 pound bag
GOPHER BEGONE <i>didn't find</i>	Unknown	one/5 pound

✓ BROADLEAF WEED STOPPER	Unknown	three/27 pound pails
ANT, FLEA & TICK KILLER <i>present</i>	Unknown	one/30 pound bag
✓ ANT, FLEA & TICK KILLER <i>present</i>	Unknown	two/25 pound jugs
ANT, FLEA & TICK KILLER <i>didn't find</i>	Unknown	one/2 1 pound pail
✓ CRABGRASS STOPPER <i>present</i>	Unknown	estimated 7 pound bin
TRIPLE PLAY FERTILIZER AND WEED KILLER AND PESTICIDE <i>didn't find</i>	Unknown	estimated 250 pound bin
✓ BROADLEAF WEED PREVENTER <i>present</i>	Unknown	estimated 100 pound bin
✓ YARD FUNGUS CONTROL <i>present</i>	Unknown	estimated 300 to 400 lb. bin
FUNGUS BEGONE <i>didn't find</i>	Unknown	estimated 200 pound bin
FERTILIZER WITH MOSS CONTROL <i>didn't find</i>	Unknown	estimated 250 to 300 lb. bin
✓ GRUB CONTROL <i>present</i>	Unknown	estimated 2,700 pound bin



✓ GRUB CONTROL	<i>Present</i>	Unknown	estimated 3,000 pound bin
ANT, FLEA & TICK KILLER <i>didn't And</i>	<i>found 40/30lb bags. *</i>	Unknown	30/30 pound bags
✓ CRABGRASS PREVENTER	<i>Present</i> <i>Possibly two crabgrass containers</i>	Unknown	estimated 2,700 pound bin
✓ ALL PURPOSE INSECT KILLER	<i>Present</i>	Unknown	two bins/estimated 1,900 lbs.
✓ LOW NITRATE WEED & FEED	<i>Present</i>	Unknown	estimated 750 pound bin
✓ CONTROL OF DISEASES LAWN FUNGICIDE	<i>Present</i>	Unknown	estimated 250 pound bin
✓ FALL WEED & FEED	<i>Present</i>	Unknown	estimated 1,500 pound bin
✓ LAWN FUNGUS CONTROL	<i>Present</i>	Unknown	estimated 750 pound bin
✓ WEED PREVENTER GRANULES	<i>Present</i>	Unknown	estimated 650 pound bin
✓ ANT, FLEA & TICK KILLER	<i>Present</i>	Unknown	estimated 3,000 pound bin
✓ 22-2-2 WITH MOSS CONTROL	<i>Present</i>	Unknown	estimated 600 pound bin

✓ BROADLEAF WEED PREVENTER	<i>present</i>	Unknown	estimated 450 pound bin
✓ 5% INSECT DUST	<i>present</i>	Unknown	estimated 800 pound bin
✓ ANT, FLEA & TICK KILLER	<i>present</i>	Unknown	estimated 700 pound bin
✓ SNAIL & SLUG KILLER 1	<i>present</i>	Unknown	estimated 50 pound bin
✓ SNAIL & SLUG KILLER 2	<i>present</i>	Unknown	two/estimated 50 pound bins
✓ BUG BAIT	<i>present</i>	Unknown	estimated 5 pound bin
✓ 10% DUST	<i>present</i>	Unknown	estimated 200 pound drum
50% WEED KILLER	<i>didn't find</i>	Unknown	one gallon jug
✓ SNAIL & SLUG KILLER	<i>present</i>	Unknown	four/5 pound bags
✓ 5% INSECT DUST	<i>present</i>	Unknown	eight/5 pound bags & Two/10 pound bags
FIRE ANT KILLER	<i>didn't find</i>	Unknown	estimated 25 pound box